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SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

June 2008 Grand Jury 08 CR 3663 - JAH

10 UNITED STATES OF AMERICA,) Criminal Case No. _____
11 Plaintiff,) E N D I C T M E N T
12 v.) Title 18, U.S.C.,
13 MIKHAIL M. TUKNOV, JR.,) Secs. 1029(a)(2), (b)(1) - Debit
14 Defendant.) Card Fraud; Title 18, U.S.C.,
) Sec. 2 - Aiding and Abetting;
) Title 18, U.S.C.,
) Sec. 1029(a)(3) - Possession of
) Unauthorized Access Devices with
) Intent to Defraud; Title 18,
) U.S.C., Sec. 1028A(a)(1) -
) Aggravated Identity Theft;
) Title 18, U.S.C., Sec. 1956(h) -
) Conspiracy to Commit Money
18 Laundering

19 The grand jury charges:

20 Count 1

21 [18 U.S.C. §1029(a)(2), (b)(1)]

22 Beginning on or about August 17, 2005, and continuing up to and
23 including on or about March 9, 2006, within the Southern District of
24 California and elsewhere, defendant MIKHAIL M. TUKNOV, JR., knowingly
25 and with intent to defraud used and attempted to use one or more
26 unauthorized access devices, specifically, approximately 1044 debit
27 card account numbers and approximately 1045 personal identification
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1 numbers (typically referred to as PINs or PIN numbers) that had been
2 stolen or obtained with intent to defraud, and by such conduct
3 obtained and attempted to obtain anything of value aggregating \$1,000
4 or more during that period; to wit, approximately \$371,504.40 in cash,
5 representing successful accesses of accounts with 424 of the
6 unauthorized debit cards and personal identification numbers; in and
7 affecting interstate and foreign commerce; all in violation of
8 Title 18, United States Code, Sections 1029(a)(2), 1029(b)(1) and 2.

9 Count 2

10 [18 U.S.C. §1029(a)(3)]

11 On or about September 13, 2005, within the Southern District of
12 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
13 intent to defraud possessed 15 or more unauthorized access devices,
14 to wit, 14 debit card numbers and 15 personal identification numbers
15 which were stolen or obtained with intent to defraud; in and affecting
16 interstate and foreign commerce; all in violation of Title 18, United
17 States Code, Section 1029(a)(3).

18 Count 3

19 [18 U.S.C. §1029(a)(3)]

20 On or about September 23, 2005, within the Southern District of
21 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
22 intent to defraud possessed 15 or more unauthorized access devices;
23 to wit, approximately 17 debit card numbers and 17 personal
24 identification numbers which were stolen or otherwise obtained with
25 intent to defraud; in and affecting interstate and foreign commerce;
26 all in violation of Title 18, United States Code, Section 1029(a)(3).

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Count 4

[18 U.S.C. §1029(a)(3)]

On or about October 4, 2005, within the Southern District of California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with intent to defraud possessed 15 or more unauthorized access devices; to wit, approximately 20 debit card numbers and 20 personal identification numbers which were stolen or otherwise obtained with intent to defraud; in and affecting interstate and foreign commerce; all in violation of Title 18, United States Code, Section 1029(a)(3).

Count 5

[18 U.S.C. §1029(a)(3)]

12 On or about October 7, 2005, within the Southern District of
13 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
14 intent to defraud possessed 15 or more unauthorized access devices;
15 to wit, approximately 40 debit card numbers and 40 personal
16 identification numbers which were stolen or otherwise obtained with
17 intent to defraud; in and affecting interstate and foreign commerce;
18 all in violation of Title 18, United States Code, Section 1029(a)(3).

Count 6

[18 U.S.C. §1029(a)(3)]

21 On or about October 12, 2005, within the Southern District of
22 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
23 intent to defraud possessed 15 or more unauthorized access devices;
24 to wit, approximately 60 debit card numbers and 60 personal
25 identification numbers which were stolen or otherwise obtained with
26 intent to defraud; in and affecting interstate and foreign commerce;
27 all in violation of Title 18, United States Code, Section 1029(a)(3).

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Count 7

[18 U.S.C. §1029(a)(3)]

3 On or about October 18, 2005, within the Southern District of
4 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
5 intent to defraud possessed 15 or more unauthorized access devices;
6 to wit, approximately 60 debit card numbers and 60 personal
7 identification numbers which were stolen or otherwise obtained with
8 intent to defraud; in and affecting interstate and foreign commerce;
9 all in violation of Title 18, United States Code, Section 1029(a)(3).

Count 8

[18 U.S.C. §1029(a)(3)]

12 On or about October 22, 2005, within the Southern District of
13 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
14 intent to defraud possessed 15 or more unauthorized access devices;
15 to wit, approximately 48 debit card numbers and 48 personal
16 identification numbers which were stolen or otherwise obtained with
17 intent to defraud; in and affecting interstate and foreign commerce;
18 all in violation of Title 18, United States Code, Section 1029(a)(3).

Count 9

[18 U.S.C. §1029(a)(3)]

21 On or about October 25, 2005, within the Southern District of
22 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
23 intent to defraud possessed 15 or more unauthorized access devices;
24 to wit, approximately 30 debit card numbers and 30 personal
25 identification numbers which were stolen or otherwise obtained with
26 intent to defraud; in and affecting interstate and foreign commerce;
27 all in violation of Title 18, United States Code, Section 1029(a)(3).

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Count 10

[18 U.S.C. §1029(a)(3)]

3 On or about October 26, 2005, at approximately 8:23 a.m., within
4 the Southern District of California, defendant MIKHAIL M. TUKNOV, JR.,
5 knowingly and with intent to defraud possessed 15 or more unauthorized
6 access devices; to wit, approximately 77 debit card numbers and
7 77 personal identification numbers which were stolen or otherwise
8 obtained with intent to defraud; in and affecting interstate and
9 foreign commerce; all in violation of Title 18, United States Code,
10 Section 1029(a)(3).

Count 11

[18 U.S.C. §1029(a)(3)]

13 On or about October 26, 2005, at approximately 10:17 p.m., within
14 the Southern District of California, defendant MIKHAIL M. TUKNOV, JR.,
15 knowingly and with intent to defraud possessed 15 or more unauthorized
16 access devices; to wit, approximately 21 debit card numbers and
17 21 personal identification numbers which were stolen or otherwise
18 obtained with intent to defraud; in and affecting interstate and
19 foreign commerce; all in violation of Title 18, United States Code,
20 Section 1029(a)(3).

Count 12

[18 U.S.C. §1029(a)(3)]

23 On or about October 28, 2005, within the Southern District of
24 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
25 intent to defraud possessed 15 or more unauthorized access devices;
26 to wit, approximately 63 debit card numbers and 63 personal
27 identification numbers which were stolen or otherwise obtained with
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1 intent to defraud; in and affecting interstate and foreign commerce;
2 all in violation of Title 18, United States Code, Section 1029(a)(3).

3 Count 13

4 [18 U.S.C. §1029(a)(3)]

5 On or about October 31, 2005, within the Southern District of
6 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
7 intent to defraud possessed 15 or more unauthorized access devices;
8 to wit, approximately 50 debit card numbers and 50 personal
9 identification numbers which were stolen or otherwise obtained with
10 intent to defraud; in and affecting interstate and foreign commerce;
11 all in violation of Title 18, United States Code, Section 1029(a)(3).

12 Count 14

13 [18 U.S.C. §1029(a)(3)]

14 On or about November 1, 2005, within the Southern District of
15 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
16 intent to defraud possessed 15 or more unauthorized access devices;
17 to wit, approximately 50 debit card numbers and 50 personal
18 identification numbers which were stolen or otherwise obtained with
19 intent to defraud; in and affecting interstate and foreign commerce;
20 all in violation of Title 18, United States Code, Section 1029(a)(3).

21 Count 15

22 [18 U.S.C. §1029(a)(3)]

23 On or about November 3, 2005, within the Southern District of
24 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
25 intent to defraud possessed 15 or more unauthorized access devices;
26 to wit, approximately 53 debit card numbers and 53 personal
27 identification numbers which were stolen or otherwise obtained with
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1 intent to defraud; in and affecting interstate and foreign commerce;
2 all in violation of Title 18, United States Code, Section 1029(a)(3).

3 Count 16

4 [18 U.S.C. §1029(a)(3)]

5 On or about November 4, 2005, within the Southern District of
6 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
7 intent to defraud possessed 15 or more unauthorized access devices;
8 to wit, approximately 50 debit card numbers and 50 personal
9 identification numbers which were stolen or otherwise obtained with
10 intent to defraud; in and affecting interstate and foreign commerce;
11 all in violation of Title 18, United States Code, Section 1029(a)(3).

12 Count 17

13 [18 U.S.C. §1029(a)(3)]

14 On or about January 3, 2006, within the Southern District of
15 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
16 intent to defraud possessed 15 or more unauthorized access devices;
17 to wit, approximately 20 debit card numbers and 20 personal
18 identification numbers which were stolen or otherwise obtained with
19 intent to defraud; in and affecting interstate and foreign commerce;
20 all in violation of Title 18, United States Code, Section 1029(a)(3).

21 Count 18

22 [18 U.S.C. §1029(a)(3)]

23 On or about February 5, 2006, within the Southern District of
24 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
25 intent to defraud possessed 15 or more unauthorized access devices;
26 to wit, approximately 30 debit card numbers and 30 personal
27 identification numbers which were stolen or otherwise obtained with

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1 intent to defraud; in and affecting interstate and foreign commerce;
2 all in violation of Title 18, United States Code, Section 1029(a)(3).

3 Count 19

4 [18 U.S.C. §1029(a)(3)]

5 On or about February 7, 2006, within the Southern District of
6 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
7 intent to defraud possessed 15 or more unauthorized access devices;
8 to wit, approximately 30 debit card numbers and 30 personal
9 identification numbers which were stolen or otherwise obtained with
10 intent to defraud; in and affecting interstate and foreign commerce;
11 all in violation of Title 18, United States Code, Section 1029(a)(3).

12 Count 20

13 [18 U.S.C. §1029(a)(3)]

14 On or about February 8, 2006, at approximately 12:48 p.m., within
15 the Southern District of California, defendant MIKHAIL M. TUKNOV, JR.,
16 knowingly and with intent to defraud possessed 15 or more unauthorized
17 access devices; to wit, approximately 25 debit card numbers and
18 25 personal identification numbers which were stolen or otherwise
19 obtained with intent to defraud; in and affecting interstate and
20 foreign commerce; all in violation of Title 18, United States Code,
21 Section 1029(a)(3).

22 Count 21

23 [18 U.S.C. §1029(a)(3)]

24 On or about February 8, 2006, at approximately 9:18 p.m., within
25 the Southern District of California, defendant MIKHAIL M. TUKNOV, JR.,
26 knowingly and with intent to defraud possessed 15 or more unauthorized
27 access devices; to wit, approximately 34 debit card numbers and
28 34 personal identification numbers which were stolen or otherwise

1 obtained with intent to defraud; in and affecting interstate and
2 foreign commerce; all in violation of Title 18, United States Code,
3 Section 1029(a)(3).

4 Count 22

5 [18 U.S.C. §1029(a)(3)]

6 On or about February 9, 2006, within the Southern District of
7 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
8 intent to defraud possessed 15 or more unauthorized access devices;
9 to wit, approximately 114 debit card numbers and 114 personal
10 identification numbers which were stolen or otherwise obtained with
11 intent to defraud; in and affecting interstate and foreign commerce;
12 all in violation of Title 18, United States Code, Section 1029(a)(3).

13 Count 23

14 [18 U.S.C. §1029(a)(3)]

15 On or about March 8, 2006, within the Southern District of
16 California, defendant MIKHAIL M. TUKNOV, JR., knowingly and with
17 intent to defraud possessed 15 or more unauthorized access devices;
18 to wit, approximately 61 debit card numbers and 61 personal
19 identification numbers which were stolen or otherwise obtained with
20 intent to defraud; in and affecting interstate and foreign commerce;
21 all in violation of Title 18, United States Code, Section 1029(a)(3).

22 Count 24

23 [18 U.S.C. §1028A(a)(1)]

24 On or about September 13, 2005, within the Southern District
25 of California, defendant MIKHAIL M. TUKNOV, JR., during and in
26 relation to a felony violation of Title 18, United States Code,
27 Section 1029(a)(3), as charged at Count 2 herein, knowingly
28 transferred, without lawful authority, a means of identification of

1 other persons, to wit, approximately 14 debit card numbers and
2 associated personal identification numbers of actual persons; in
3 violation of Title 18, United States Code, Section 1028A(a)(1).

4 Count 25

5 [18 U.S.C. §1028A(a)(1)]

6 On or about September 23, 2005, within the Southern District of
7 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
8 to a felony violation of Title 18, United States Code,
9 Section 1029(a)(3), as charged at Count 3 herein, knowingly
10 transferred, without lawful authority, a means of identification of
11 other persons, to wit, approximately 17 debit card numbers and
12 associated personal identification numbers of actual persons; in
13 violation of Title 18, United States Code, Section 1028A(a)(1).

14 Count 26

15 [18 U.S.C. §1028A(a)(1)]

16 On or about October 4, 2005, within the Southern District of
17 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
18 to a felony violation of Title 18, United States Code,
19 Section 1029(a)(3), as charged at Count 4 herein, knowingly
20 transferred, without lawful authority, a means of identification of
21 other persons, to wit, approximately 20 debit card numbers and
22 associated personal identification numbers of actual persons; in
23 violation of Title 18, United States Code, Section 1028A(a)(1).

24 Count 27

25 [18 U.S.C. §1028A(a)(1)]

26 On or about October 7, 2005, within the Southern District of
27 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
28 to a felony violation of Title 18, United States Code,

1 Section 1029(a)(3), as charged at Count 5 herein, knowingly
2 transferred, without lawful authority, a means of identification of
3 other persons, to wit, approximately 40 debit card numbers and
4 associated personal identification numbers of actual persons; in
5 violation of Title 18, United States Code, Section 1028A(a)(1).

6 Count 28

7 [18 U.S.C. §1028A(a)(1)]

8 On or about October 12, 2005, within the Southern District of
9 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
10 to a felony violation of Title 18, United States Code,
11 Section 1029(a)(3), as charged at Count 6 herein, knowingly
12 transferred, without lawful authority, a means of identification of
13 other persons, to wit, approximately 60 debit card numbers and
14 associated personal identification numbers of actual persons; in
15 violation of Title 18, United States Code, Section 1028A(a)(1).

16 Count 29

17 [18 U.S.C. §1028A(a)(1)]

18 On or about October 18, 2005, within the Southern District of
19 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
20 to a felony violation of Title 18, United States Code,
21 Section 1029(a)(3), as charged at Count 7 herein, knowingly
22 transferred, without lawful authority, a means of identification of
23 other persons, to wit, approximately 60 debit card numbers and
24 associated personal identification numbers of actual persons; in
25 violation of Title 18, United States Code, Section 1028A(a)(1).

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Count 30

[18 U.S.C. §1028A(a)(1)]

3 On or about October 22, 2005, within the Southern District of
4 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
5 to a felony violation of Title 18, United States Code,
6 Section 1029(a)(3), as charged at Count 8 herein, knowingly
7 transferred, without lawful authority, a means of identification of
8 other persons, to wit, approximately 48 debit card numbers and
9 associated personal identification numbers of actual persons; in
10 violation of Title 18, United States Code, Section 1028A(a)(1).

Count 31

[18 U.S.C. §1028A(a)(1)]

13 On or about October 25, 2005, within the Southern District of
14 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
15 to a felony violation of Title 18, United States Code,
16 Section 1029(a)(3), as charged at Count 9 herein, knowingly
17 transferred, without lawful authority, a means of identification of
18 other persons, to wit, approximately 30 debit card numbers and
19 associated personal identification numbers of actual persons; in
20 violation of Title 18, United States Code, Section 1028A(a)(1).

Count 32

[18 U.S.C. §1028A(a)(1)]

23 On or about October 26, 2005, within the Southern District of
24 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
25 to felony violations of Title 18, United States Code,
26 Section 1029(a)(3), as charged at Counts 10 and 11 herein, knowingly
27 transferred, without lawful authority, a means of identification of
28 other persons, to wit, approximately 98 debit card numbers and

1 associated personal identification numbers of actual persons; in
2 violation of Title 18, United States Code, Section 1028A(a)(1).

3 Count 33

4 [18 U.S.C. §1028A(a)(1)]

5 On or about October 28, 2005, within the Southern District of
6 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
7 to a felony violation of Title 18, United States Code,
8 Section 1029(a)(3), as charged at Count 12 herein, knowingly
9 transferred, without lawful authority, a means of identification of
10 other persons, to wit, approximately 63 debit card numbers and
11 associated personal identification numbers of actual persons; in
12 violation of Title 18, United States Code, Section 1028A(a)(1).

13 Count 34

14 [18 U.S.C. §1028A(a)(1)]

15 On or about October 31, 2005, within the Southern District of
16 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
17 to a felony violation of Title 18, United States Code,
18 Section 1029(a)(3), as charged at Count 13 herein, knowingly
19 transferred, without lawful authority, a means of identification of
20 other persons, to wit, approximately 50 debit card numbers and
21 associated personal identification numbers of actual persons; in
22 violation of Title 18, United States Code, Section 1028A(a)(1).

23 Count 35

24 [18 U.S.C. §1028A(a)(1)]

25 On or about November 1, 2005, within the Southern District of
26 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
27 to a felony violation of Title 18, United States Code,
28 Section 1029(a)(3), as charged at Count 14 herein, knowingly

1 transferred, without lawful authority, a means of identification of
2 other persons, to wit, approximately 50 debit card numbers and
3 associated personal identification numbers of actual persons; in
4 violation of Title 18, United States Code, Section 1028A(a)(1).

5 Count 36

6 [18 U.S.C. §1028A(a)(1)]

7 On or about November 3, 2005, within the Southern District of
8 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
9 to a felony violation of Title 18, United States Code,
10 Section 1029(a)(3), as charged at Count 15 herein, knowingly
11 transferred, without lawful authority, a means of identification of
12 other persons, to wit, approximately 53 debit card numbers and
13 associated personal identification numbers of actual persons; in
14 violation of Title 18, United States Code, Section 1028A(a)(1).

15 Count 37

16 [18 U.S.C. §1028A(a)(1)]

17 On or about November 4, 2005, within the Southern District of
18 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
19 to a felony violation of Title 18, United States Code,
20 Section 1029(a)(3), as charged at Count 16 herein, knowingly
21 transferred, without lawful authority, a means of identification of
22 other persons, to wit, approximately 50 debit card numbers and
23 associated personal identification numbers of actual persons; in
24 violation of Title 18, United States Code, Section 1028A(a)(1).

25 Count 38

26 [18 U.S.C. §1028A(a)(1)]

27 On or about January 3, 2006, within the Southern District of
28 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation

1 to a felony violation of Title 18, United States Code,
2 Section 1029(a)(3), as charged at Count 17 herein, knowingly
3 transferred, without lawful authority, a means of identification of
4 other persons, to wit, approximately 20 debit card numbers and
5 associated personal identification numbers of actual persons; in
6 violation of Title 18, United States Code, Section 1028A(a)(1).

7 Count 39

8 [18 U.S.C. §1028A(a)(1)]

9 On or about February 5, 2006, within the Southern District of
10 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
11 to a felony violation of Title 18, United States Code,
12 Section 1029(a)(3), as charged at Count 18 herein, knowingly
13 transferred, without lawful authority, a means of identification of
14 other persons, to wit, approximately 30 debit card numbers and
15 associated personal identification numbers of actual persons; in
16 violation of Title 18, United States Code, Section 1028A(a)(1).

17 Count 40

18 [18 U.S.C. §1028A(a)(1)]

19 On or about February 7, 2006, within the Southern District of
20 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
21 to a felony violation of Title 18, United States Code,
22 Section 1029(a)(3), as charged at Count 19 herein, knowingly
23 transferred, without lawful authority, a means of identification of
24 other persons, to wit, approximately 30 debit card numbers and
25 associated personal identification numbers of actual persons; in
26 violation of Title 18, United States Code, Section 1028A(a)(1).

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Count 41

[18 U.S.C. §1028A(a)(1)]

3 On or about February 8, 2006, within the Southern District of
4 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
5 to felony violations of Title 18, United States Code,
6 Section 1029(a)(3), as charged at Count 20 and 21 herein, knowingly
7 transferred, without lawful authority, a means of identification of
8 other persons, to wit, approximately 59 debit card numbers and
9 associated personal identification numbers of actual persons; in
10 violation of Title 18, United States Code, Section 1028A(a)(1).

Count 42

[18 U.S.C. §1028A(a)(1)]

13 On or about February 9, 2006, within the Southern District of
14 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
15 to a felony violation of Title 18, United States Code,
16 Section 1029(a)(3), as charged at Count 22 herein, knowingly
17 transferred, without lawful authority, a means of identification of
18 other persons, to wit, approximately 114 debit card numbers and
19 associated personal identification numbers of actual persons; in
20 violation of Title 18, United States Code, Section 1028A(a)(1).

Count 43

[18 U.S.C. §1028A(a)(1)]

23 On or about March 8, 2006, within the Southern District of
24 California, defendant MIKHAIL M. TUKNOV, JR., during and in relation
25 to a felony violation of Title 18, United States Code,
26 Section 1029(a)(3), as charged at Count 23 herein, knowingly
27 transferred, without lawful authority, a means of identification of
28 other persons, to wit, approximately 61 debit card numbers and

1 associated personal identification numbers of actual persons; in
2 violation of Title 18, United States Code, Section 1028A(a)(1).

Count 44

[18 U.S.C. §1956(h)]

5 Beginning on or about August 17, 2005, and continuing to on or
6 about March 9, 2006, in the Southern District of California and
7 elsewhere, defendant MIKHAIL M. TUKNOV, JR., knowingly conspired and
8 agreed with others known and unknown to the grand jury to commit an
9 offense against the United States, to wit, money laundering, in
10 violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

Objects of the Conspiracy

12 A. It was an object of the conspiracy that defendant MIKHAIL
13 M. TUKNOV, JR., and his known and unknown co-conspirators located in
14 the United States, the Dominican Republic and Russia knowingly would
15 engage in debit card fraud in violation of Title 18, United States
16 Code, Sections 1029(a)(2) and 1029(a)(3) as alleged at Counts 1
17 through 23 herein.

18 B. It also was an object of the conspiracy that defendant
19 MIKHAIL M. TUKNOV, JR., and his known and unknown co-conspirators in
20 the United States, the Dominican Republic and Russia, knowingly would
21 engage in financial transactions involving the proceeds of specified
22 unlawful activity, that is, debit card fraud in violation of Title 18,
23 United States Code, Sections 1029(a)(2) and (b)(1) as alleged at
24 Count 1 herein, with the intent to promote the carrying on of
25 debit card fraud in violation of Title 18, United States Code,
26 Sections 1029(a)(2) and (a)(3) as charged at Counts 1 through 23
27 herein.

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Manner and Means of the Conspiracy

2 1. It was part of the conspiracy that defendant MIKHAIL M.
3 TUKNOV, JR., would and did obtain from unknown sources unauthorized
4 debit card numbers and associated personal identification numbers
5 which were stolen or otherwise obtained with intent to defraud.

6 2. It further was part of the conspiracy that defendant MIKHAIL
7 M. TUKNOV, JR., would and did transfer the unauthorized debit card
8 numbers and associated personal identification numbers to a co-
9 conspirator in the Dominican Republic for false debit cards to be
10 created and encoded and the accounts associated with the debit card
11 numbers to be accessed at Automated Teller Machines and cash
12 withdrawals obtained.

13 3. It further was part of the conspiracy that defendant MIKHAIL
14 M. TUKNOV, JR., would and did provide his co-conspirator in the
15 Dominican Republic with contact information of persons in Russia to
16 send the proceeds of the cashing out of the unauthorized cards in
17 order to obtain additional unauthorized card numbers and associated
18 personal identification numbers.

19 4. It further was part of the conspiracy that defendant MIKHAIL
20 M. TUKNOV, JR., would and did receive from his Russian co-conspirators
21 a percentage of the proceeds sent to them from the co-conspirator in
22 the Dominican Republic or from other co-conspirators in the United
23 States and receive additional unauthorized debit card numbers and
24 associated personal identification numbers in order to continue to
25 commit debit card fraud.

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1 5. It further was part of the conspiracy that pursuant to the
2 direction of defendant MIKHAIL M. TUKNOV, JR., co-conspirators in the
3 Dominican Republic and in the United States caused approximately
4 \$96,509.77 to be transmitted to various co-conspirators in Russia
5 between September 24, 2005, and November 18, 2005.

6 6. It further was part of the conspiracy that during the period
7 September 24, 2005, and November 18, 2005, defendant MIKHAIL M.
8 TUKNOV, JR., received approximately \$15,210.00 from his co-
9 conspirators in Russia and obtained approximately 600 unique
10 unauthorized debit card numbers and associated personal identification
11 numbers with which to continue the criminal enterprise.
12 All in violation of Title 18, United States Code, Section 1956(h).

13 DATED: October 23, 2008

A TRUE BILL:

Foreperson

18 KAREN P. HEWITT
United States Attorney

19 By: Mitchell D. Dembin
20 MITCHELL D. DEMBIN
21 Assistant U. S. Attorney